

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:) BANKRUPTCY CASE NO.: 05-11741-DWS
)
Danielle J. Brandon) CHAPTER 13
)
Debtor.)

**OBJECTIONS BY EMC MORTGAGE
CORPORATION TO CONFIRMATION OF CHAPTER 13 PLAN**

EMC Mortgage Corporation ("EMC"), by and through its attorneys, Grenen & Birsic, P.C., respectfully represents as follows:

1. This case was filed on February 8, 2005. A plan was filed on the same date.
2. EMC is a party in interest in this case, as it services the mortgage on the debtor's residence.
3. EMC will be filing a claim listing the total arrears as of the bankruptcy filing date in the amount of \$19,019.76.
4. The plan contemplates the cure of arrears in the amount of \$15,000.00.
5. Consequently, the plan is underfunded. EMC is entitled to receive the full amount of the arrears as a condition to the cure and reinstatement of the mortgage. In the event that the plan is modified to provide for the full amount of the arrears, then EMC will withdraw the objections.

WHEREFORE, EMC respectfully requests that this Court deny confirmation of the proposed plan.

Respectfully submitted,

GRENN & BIRSIC, P.C.

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